

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE  
CO., et al.,

Plaintiffs,

-against-

MICHAEL D. GREEN, M.D., et al.,

Defendants  
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**STIPULATION**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiffs and Defendant, Danny Montanez ("Montanez"), as follows:

1. Plaintiffs' motion requesting a notation of default against Montanez pursuant to Fed. R. Civ. Proc. 55(a), filed on July 7, 2010 is hereby withdrawn.
2. Montanez's time to answer and/or move with respect to the Plaintiffs' Complaint is extended up through and including September 26, 2010. Montanez hereby waives any affirmative defense based on lack of personal jurisdiction and/or improper service of process.

Dated: Uniondale, New York  
August 2, 2010

**RIVKIN RADLER LLP**

By: 

Barry I. Levy (BL 2190)  
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*Counsel for Plaintiffs Government Employees  
Insurance Co., GEICO Indemnity Co. and  
GEICO Casualty Co.*

**SHAPIRO & COLEMAN, P.C.**

By: 

Richard H. Coleman (RHC7193)  
727 N. Broadway  
N. Massapequa, New York 11758

*Counsel for Defendant, Danny Montanez*

**SO ORDERED:**

\_\_\_\_\_  
U.S.D.J.

Dated: \_\_\_\_\_, 2010